UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE (MEMPHIS)

IAN WILLIAMS,

CASE NO.

Plaintiff,

VS.

Judge

Magistrate Judge

TRANSUNION,

Defendant.

TRANS UNION LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union LLC ("Trans Union") hereby removes the subject action from the General Sessions Court of Shelby County, State of Tennessee, to the United States District Court for the Western District of Tennessee (Memphis), on the following grounds:

- 1. Plaintiff Ian Williams served Trans Union on or about May 17, 2025, with a Notice of Service and Civil Warrant filed in the General Sessions Court of Shelby County, Tennessee. Copies of the Notice and Civil Warrant are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.
- Plaintiff makes claims against Trans Union under the Fair Credit Reporting Act, 15
 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint generally.
- 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

- 4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the General Sessions Court of Shelby County, Tennessee, to the United States District Court for the Western District of Tennessee (Memphis).
- 5. Notice of this removal will promptly be filed with the General Sessions Court of Shelby County, Tennessee and served upon all adverse parties.

WHEREFORE, Defendant Trans Union LLC, by counsel, removes the subject action from the General Sessions Court of Shelby County, Tennessee to this United States District Court, Western District of Tennessee (Memphis),

Respectfully submitted,

Dated: June 13, 2025

/s/ C. Douglas Dooley

C. Douglas Dooley, Esq. Laura E. Bassett, Esq. Leitner, Williams, Dooley & Napolitan PLLC 200 W. M.L. King Blvd., Suite 500

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Counsel for Defendant Trans Union LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the 13th day of June, 2025. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the 13th day of June, 2025, properly addressed as follows:

Pro Se Plaintiff	
3214 Alta Road	
Memphis, TN 38109	

/s/ C. Douglas Dooley

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Counsel for Defendant Trans Union LLC